



JUL 30 2007

7-30-07

NR

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURTIN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

BONNIE SUE MILO,

Plaintiff,

vs.

PROFESSIONAL ACCOUNT
MANAGEMENT, L.L.C.,

Defendant.

)
)
)
) 07CV 4276
) JUDGE SHADUR
) MAGISTRATE JUDGE DENLOW
)
)
)COMPLAINTINTRODUCTION

1. Plaintiff Bonnie Sue Milo brings this action to secure redress from unlawful credit and collection practices engaged in by defendant Professional Account Management, L.L.C.. Plaintiff alleges violation of the Fair Debt Collection Practices Act, 15 U.S.C. §1692 et seq. ("FDCPA"). The FDCPA broadly prohibits unfair or unconscionable collection methods; conduct which harasses, oppresses or abuses any debtor; and any false, deceptive or misleading statements, in connection with the collection of a debt; it also requires debt collectors to give debtors certain information. 15 U.S.C. §§1692d, 1692e, 1692f and 1692g.

VENUE AND JURISDICTION

2. This Court has jurisdiction under 15 U.S.C. §1692k (FDCPA), 28 U.S.C. §1331 and 28 U.S.C. §1337.

3. Venue and personal jurisdiction in this District are proper because:

- a. Defendant's collection communications were received by plaintiff within this District;
- b. Defendant does business within this District.

PARTIES

4. Plaintiff Bonnie Sue Milo is an individual who resides in the Northern District of Illinois.

5. Defendant Professional Account Management, L.L.C. is a limited liability company organized under Wisconsin law with principal offices at 633 W. Wisconsin Ave., Suite 1600, Milwaukee, WI 53203. It does business in Illinois. Its registered agent and office are CT Corporation System, 208 S. LaSalle St., Suite 814, Chicago, IL 60604-1101.

6. Professional Account Management, L.L.C. operates a collection agency and is engaged in the business of using the mails and telephone to collect consumer debts originally owed to others.

7. Professional Account Management, L.L.C. is a debt collector as defined in the FDCPA.

FACTS

8. On May 1, 2007, defendant Professional Account Management, L.L.C. sent plaintiff Bonnie Sue Milo the collection letter attached as Exhibit A.

9. The letter sought to collect an alleged defaulted debt incurred for personal, family or household purposes.

10. Exhibit A was the initial letter plaintiff received from defendant regarding the debts described therein.

11. On information and belief, Exhibit A was the initial letter defendant sent plaintiff regarding the debt described therein.

12. On information and belief, Exhibit A represents a form letter intended for use by Professional Account Management, L.L.C. as the initial letter it sends to a consumer.

13. On May 11, 2007, plaintiff, by counsel, disputed the debt (which had been satisfied and released). Exhibit B is a copy of plaintiff's dispute letter.

14. Subsequently, on June 9, 2007, Professional Account Management, L.L.C. again contacted plaintiff directly demanding payment of the debt. A copy of the June 9, 2007 letter is attached as Exhibit C.

15. Plaintiff was harassed and damaged as a result.

VIOLATIONS COMPLAINED OF

16. Defendant thereby violated 15 U.S.C. §1692g, by continuing collection activity without providing validation, and 15 U.S.C. §1692c, by contacting a represented debtor directly.

17. Defendant violated 15 U.S.C. §§1692e, 1692e(2), 1692e(5), and 1692e(10), by misrepresenting the status of the debt as unpaid and seeking to collect amounts not owed.

WHEREFORE, the Court should enter judgment in favor of plaintiff and against defendant for:

- (1) Statutory damages;
- (2) Actual damages;
- (3) Attorney's fees, litigation expenses and costs of suit;
- (4) Such other and further relief as the Court deems proper.



Daniel A. Edelman

Daniel A. Edelman
Cathleen M. Combs
James O. Lattuner
EDELMAN, COMBS, LATTURNER
& GOODWIN, L.L.C.
120 S. LaSalle Street, 18th Floor
Chicago, Illinois 60603
(312) 739-4200
(312) 419-0379 (FAX)

JURY DEMAND

Plaintiff demands trial by jury.



Daniel A. Edelman

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NOTICE OF LIEN

Please be advised that we claim a lien upon any recovery herein for 1/3 or such amount as a court awards.



Daniel A. Edelman

Daniel A. Edelman
EDELMAN, COMBS, LATTURNER
& GOODWIN, LLC
120 S. LaSalle Street, 18th Floor
Chicago, Illinois 60603
(312) 739-4200
(312) 419-0379 (FAX)

EXHIBIT A

P: 1/1



ONPROF36
PO Box 1022
Wixom MI 48383-1022
ADDRESS SERVICE REQUESTED



**Professional
Account
Management, L.L.C.**
Specializing in Receivables Management
Telephone: (877) 501-0923

MAIL ALL CORRESPONDENCE TO:

Professional Account Management LLC
Collection Services Division
PO Box 391
Milwaukee WI 53201-0391

[illegible]

May 1, 2007

#BWNHRMD 280273 1175
#0501 0807 0001 1768# 650 153-407

Abstract

Bonnie S & Lois E Millo
24707 State Route 53
Elmwood IL 60421-9653

Creditor: TCF BANK
Account #: 6507163
Amount: \$84443.50

—Detach Upper Portion And Return With Payment—

Creditor:	TCF BANK
Account #:	6507153
Amount:	\$64443.50



The above referenced account has been placed with our office for collection. All collection activity will stop when the account balance has been paid in full.

For your convenience, the following payment options are available:

1. Check or Money Order by U.S. Mail
To ensure the proper credit to your account, return the top portion of this notice with your check or money order in the envelope provided. Please make your check or money order payable to Professional Account Management.
2. Visa, MasterCard and Check by Phone
Private payments may be made 24 hours a day through our automated system. Call 888-676-6287. Payment via this method will require entry of the account number indicated above.
3. Western Union.
Process payment using Western Union Code City PAM State WI.

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of this debt or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days from receiving this notice, this office will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. Upon written request made within 30 days of receiving this notice, this office will provide you with the name and address of the original creditor, if different from the current creditor.

This communication is from a debt collection company. This is an attempt to collect a debt, and any information obtained will be used for that purpose.

This collection agency is licensed by the Division of Banking P.O. Box 7876, Madison WI 53707.

If you wish to pay by VISA or MasterCard, fill in the information below and return the entire letter to us.



Account Number	Payment Amount	Expiration Date
	\$	/ /

Card Holder Name
10NPA00F30407

Signature of Card Holder

Date _____

Professional Account Management LLC • Collection Services Division • PO Box 201 • Milwaukee WI 53201-0201 • Phone: (877) 501-4023

EXHIBIT B

JAMES J. TIRA

ATTORNEY AT LAW
215 So. BROADWAY STREET
COAL CITY, ILLINOIS 60416

JAMES J. TIRA

TX. 815-634-4575
FAX 815-634-2846

11 May 2007

Professional Account Management LLC
Collection Services Division
P.O. Box 391
Milwaukee, WI. 53201-0391

RE: Bonnie & Lois Milo
TCF Acct. No. 6507153

Dear Sirs:

My office has been contacted by Bonnie Milo with respect to the attached debt collection letter which was sent to her by your debt collection firm.

Please be advised that this debt was cancelled by TCF by way of a contract to accept deed in payment of mortgage debt. A copy of the pertinent pages of this agreement is enclosed with this letter. The debt cancellation provisions have been highlighted.

If your firm persists in this effort to collect the discharged indebtedness, my client will pursue all her legal rights and remedies under federal and Illinois law with respect to this debt collection harassment.

Should you have any questions regarding this matter, please do not hesitate to contact my office

Respectfully,

James J. Tira

cc: Bonnie Milo

EXHIBIT C

TO: 18156342846



**Professional
Account
Management, L.L.C.**
Specializing in Receivables Management
Telephone: (877) 501-9923

MAIL ALL CORRESPONDENCE TO:

Professional Account Management LLC
Collection Services Division
PO Box 391
Milwaukee WI 53201-0391

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100 101 102 103 104 105 106 107 108 109 110 111 112 113 114 115 116 117 118 119 120 121 122 123 124 125 126 127 128 129 130 131 132 133 134 135 136 137 138 139 140 141 142 143 144 145 146 147 148 149 150 151 152 153 154 155 156 157 158 159 160 161 162 163 164 165 166 167 168 169 170 171 172 173 174 175 176 177 178 179 180 181 182 183 184 185 186 187 188 189 190 191 192 193 194 195 196 197 198 199 200 201 202 203 204 205 206 207 208 209 210 211 212 213 214 215 216 217 218 219 220 221 222 223 224 225 226 227 228 229 230 231 232 233 234 235 236 237 238 239 240 241 242 243 244 245 246 247 248 249 250 251 252 253 254 255 256 257 258 259 260 261 262 263 264 265 266 267 268 269 270 271 272 273 274 275 276 277 278 279 280 281 282 283 284 285 286 287 288 289 290 291 292 293 294 295 296 297 298 299 300 301 302 303 304 305 306 307 308 309 310 311 312 313 314 315 316 317 318 319 320 321 322 323 324 325 326 327 328 329 330 331 332 333 334 335 336 337 338 339 340 341 342 343 344 345 346 347 348 349 350 351 352 353 354 355 356 357 358 359 360 361 362 363 364 365 366 367 368 369 370 371 372 373 374 375 376 377 378 379 380 381 382 383 384 385 386 387 388 389 390 391 392 393 394 395 396 397 398 399 400 401 402 403 404 405 406 407 408 409 410 411 412 413 414 415 416 417 418 419 420 421 422 423 424 425 426 427 428 429 430 431 432 433 434 435 436 437 438 439 440 441 442 443 444 445 446 447 448 449 450 451 452 453 454 455 456 457 458 459 460 461 462 463 464 465 466 467 468 469 470 471 472 473 474 475 476 477 478 479 480 481 482 483 484 485 486 487 488 489 490 491 492 493 494 495 496 497 498 499 500 501 502 503 504 505 506 507 508 509 510 511 512 513 514 515 516 517 518 519 520 521 522 523 524 525 526 527 528 529 530 531 532 533 534 535 536 537 538 539 540 541 542 543 544 545 546 547 548 549 550 551 552 553 554 555 556 557 558 559 560 561 562 563 564 565 566 567 568 569 570 571 572 573 574 575 576 577 578 579 580 581 582 583 584 585 586 587 588 589 590 591 592 593 594 595 596 597 598 599 600 601 602 603 604 605 606 607 608 609 610 611 612 613 614 615 616 617 618 619 620 621 622 623 624 625 626 627 628 629 630 631 632 633 634 635 636 637 638 639 640 641 642 643 644 645 646 647 648 649 650 651 652 653 654 655 656 657 658 659 660 661 662 663 664 665 666 667 668 669 670 671 672 673 674 675 676 677 678 679 680 681 682 683 684 685 686 687 688 689 690 691 692 693 694 695 696 697 698 699 700 701 702 703 704 705 706 707 708 709 710 711 712 713 714 715 716 717 718 719 720 721 722 723 724 725 726 727 728 729 730 731 732 733 734 735 736 737 738 739 740 741 742 743 744 745 746 747 748 749 750 751 752 753 754 755 756 757 758 759 760 761 762 763 764 765 766 767 768 769 770 771 772 773 774 775 776 777 778 779 780 781 782 783 784 785 786 787 788 789 790 791 792 793 794 795 796 797 798 799 800 801 802 803 804 805 806 807 808 809 810 811 812 813 814 815 816 817 818 819 820 821 822 823 824 825 826 827 828 829 830 831 832 833 834 835 836 837 838 839 840 841 842 843 844 845 846 847 848 849 850 851 852 853 854 855 856 857 858 859 860 861 862 863 864 865 866 867 868 869 870 871 872 873 874 875 876 877 878 879 880 881 882 883 884 885 886 887 888 889 890 891 892 893 894 895 896 897 898 899 900 901 902 903 904 905 906 907 908 909 910 911 912 913 914 915 916 917 918 919 920 921 922 923 924 925 926 927 928 929 930 931 932 933 934 935 936 937 938 939 940 941 942 943 944 945 946 947 948 949 950 951 952 953 954 955 956 957 958 959 960 961 962 963 964 965 966 967 968 969 970 971 972 973 974 975 976 977 978 979 980 981 982 983 984 985 986 987 988 989 990 991 992 993 994 995 996 997 998 999 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011 1012 1013 1014 1015 1016 1017 1018 1019 1020 1021 1022 1023 1024 1025 1026 1027 1028 1029 1030 1031 1032 1033 1034 1035 1036 1037 1038 1039 1040 1

Bonnie S & Lois E Millo
24707 State Route 53
Elwood IL 60421-9553

Creditor: TCF BANK
Account #: 6507153
Amount: \$84443.50

---Detach Upper Portion And Return With Payment---



Creditor:	TCF BANK
Account #:	8507153
Amount:	\$84443.50

Amount: \$64443.50

Our first notice setting forth your dispute rights under the Fair Debt Collection Practices Act has gone unanswered. We can only assume you accept responsibility for the above referenced debt. We must once again call your attention to its resolution.

Your account has now been listed with a national credit bureau and Chex Systems. Your credit rating and ability to open a checking account with a U.S. bank could be adversely affected.

For your convenience, the following payment options are available:

1. Check or Money Order by U.S. Mail
To ensure the proper credit to your account, return the top portion of this notice with your check or money order in the envelope provided. Please make your check or money order payable to Professional Account Management.
2. Visa, MasterCard and Check by Phone
Private payments may be made 24 hours a day through our automated system. Call 888-676-6267. Payment via this method will require entry of the account number indicated above.
3. Western Union.
Process payment using Western Union Code City PAM State WI.

TO AVOID FURTHER COLLECTION ACTIVITY ON THIS ACCOUNT, PLEASE INITIATE PAYMENT TODAY
OR CALL OUR OFFICES TO SPEAK TO A REPRESENTATIVE ABOUT PAYMENT ARRANGEMENTS.
877-501-9923

This communication is from a debt collection company. This is an attempt to collect a debt, and any information obtained will be used for that purpose.

This collection agency is licensed by the Division of Banking P.O. Box 7876, Madison WI 53707.

If you wish to pay by VISA or MasterCard, fill in the information below and return the entire letter to us.



If you wish to pay by VISA or MasterCard, fill in the information																
Account Number										Payment Amount					Expiration Date	
<div style="border: 1px solid black; display: flex; justify-content: space-between;"> 12345678910 11121314151617181920 </div>										\$					<div style="border: 1px solid black; display: flex; justify-content: space-between;"> 12345678910 </div>	
Card Holder Name										Signature of Card Holder					Date	
SONPROF30400																

Professional Account Management LLC • Collection Services Division • PO Box 391 • Milwaukee WI 53201-0291 • Phone: (877) 501-9923